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WESTERN DISTRICT OF WASHINGTON AT TACOMA			
BY _____	DEPUTY		

Magistrate Judge David W. Christel

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

V.

ISAIAH M. CAMPBELL,

Defendant.

CASE NO. 3:23-mj-05396

COMPLAINT for VIOLATION

Title 18, United States Code,
Section 922(g)(1)

BEFORE, DAVID W. CHR
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Firearm)

On or about October 4, 2023, in Pierce County, within the Western District of Washington, ISAIAH M. CAMPBELL, knowing he had been convicted of the following crimes punishable by a term of imprisonment exceeding one year:

i. *Conspiracy to Distribute Cocaine*, in United States District Court for the Western District of Washington, under case number 2:09-CR-353, on or about June 25, 2010;

1 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
2 is: a Smith & Wesson, Model SD9VE, 9mm handgun, that had been shipped and
3 transported in interstate and foreign commerce.

4 All in violation of Title 18, United States Code, Section 922(g)(1).

5 And the complainant states that this Complaint is based on the following
6 information:

7 I, Kit K. Radosevich, being first duly sworn on oath, depose and say:

8 **AFFIANT BACKGROUND**

9 1. I am an “investigative or law enforcement officer of the United States”
10 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of
11 the United States who is empowered by law to conduct investigations of, and to make
12 arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

13 2. I, Kit Radosevich, am a Special Agent with the Bureau of Alcohol,
14 Tobacco, Firearms and Explosives (ATF), and have been so employed since 2015. As a
15 Special Agent, I am authorized to investigate violations of laws of the United States, and
16 to execute warrants issued under the authority of the United States. I am familiar with
17 and have received formal training regarding the enforcement of federal firearms, arson,
18 and explosives laws, including completion of the Federal Law Enforcement Training
19 Center’s Criminal Investigator Training Program, and ATF’s Special Agent Basic
20 Training Program in Glynco, Georgia. During my employment, I have also conducted,
21 and participated in a variety of investigations, including investigations into violations of
22 federal firearms laws. Prior to joining the ATF, I worked as a corporate accountant, and I
23 maintain a license as a Certified Public Accountant (CPA).

24 3. The information set forth in this affidavit is based upon my own
25 investigation, police reports, the investigation conducted by others, and the details related
26 to me by others familiar with this matter. Because this affidavit is made for the limited
27 purpose of establishing probable cause, I have not listed each and every fact known to me
28 concerning this investigation. I have set forth only the facts that I believe are necessary

1 to establish probable cause to believe that ISAIAH M. CAMPBELL committed the
2 aforementioned crime.

3 **SUMMARY OF INVESTIGATION**

4 4. In June of 2023, the Tacoma Police Department (TPD) initiated an
5 investigation into CAMPBELL as a distributor of controlled substances during a
6 Loitering for Purpose of Drug Activity (LPDA) Set Mission conducted in numerous Stay
7 Out of Drug Areas (SODA) in Pierce County. These Set Missions are operations
8 assigned to Special Investigations Division (SID) officers who are tasked with
9 performing surveillance and arrests in areas where numerous complaints of drug activity
10 are received.

11 5. During these Set Missions, TPD officers observed CAMPBELL conducting
12 what appeared to be hand-to-hand drug transactions around the City of Tacoma. Officers
13 identified the transactions they observed as hand-to-hand drug transactions because the
14 behavior exhibited is consistent with other subjects known to deal narcotics. Numerous
15 individuals would approach the driver's side window of CAMPBELL's vehicle on foot,
16 briefly speak, exchange items with the driver, quickly conceal the items, then leave
17 shortly after the exchange. This activity would repeat in the same manner with various
18 individuals over a short period of time in known SODA areas.

19 6. Additional surveillance operations conducted on CAMPBELL indicated he
20 resided at 2063 East 44th St, Tacoma, WA, and drove a 2013, black BMW 650Ci, bearing
21 Washington license plate #BUL6767. Washington Department of Licensing records
22 revealed the vehicle to be registered in his name. An employment history request
23 through Washington State Employee Security Department revealed that CAMPBELL did
24 not receive any reported wages within the scope of the request, from January 1st, 2021, to
25 Present.

26 7. Information provided to TPD officers from reliable confidential informants
27 familiar with CAMPBELL further confirmed CAMPBELL was a prolific narcotics dealer
28 in the Pierce/King County areas and is known to carry a firearm.

1 8. Officers utilized a Seattle Police Narcotics K9 assigned to Officer Shaub to
2 conduct a sweep of CAMPBELL's vehicle while parked in the alley parking area of
3 CAMPBELL's residence in early morning hours. Officer Shaub advised his Narcotics
4 K9 indicated/alerted to the vehicle that narcotics were or are present.

5 9. Between August and September of 2023, TPD continued to conduct
6 surveillance on CAMPBELL and observed numerous interactions with other individuals
7 that again appeared to be hand-to-hand drug transactions. TPD officers also saw
8 CAMPBELL regularly utilizing his BMW 650Ci, bearing Washington license plate
9 #BUL6767 to conduct these transactions.

10 10. On October 4, 2023, TPD conducted a surveillance operation on
11 CAMPBELL to locate and surveil CAMPBELL. During that surveillance operation,
12 TPD officers observed CAMPBELL driving his BMW 650Ci, bearing Washington
13 license plate #BUL6767. TPD officers observed CAMPBELL meet with a male in a
14 Mercedes. CAMPBELL and the male were then seen driving to a warehouse, this
15 warehouse has different rooms or sections that are leased by large legal marijuana grow
16 businesses. CAMPBELL was seen walking towards the door of the large main gray
17 warehouse. Approximately 25 minutes later, CAMPBEL reappeared carrying a large
18 black bag. Afterwards, CAMPBELL and the male driving the Mercedes left the
19 marijuana distribution center and drove to a nearby secluded parking lot. TPD officers
20 observed CAMPBELL and the driver of the Mercedes loitering around their vehicles in
21 the parking lot. There, TPD officers observed what appeared to be a transaction between
22 CAMPBELL and the driver of the Mercedes. Officers believed this to be a hand-to-hand
23 drug transaction. After this suspected transaction, both men shook hands and returned to
24 their respective vehicles. TPD officers instructed marked TPD units to contact
25 CAMPBELL and the driver of the Mercedes immediately after observing the drug
26 transaction occur.

27 11. As the uniformed officers approached CAMPBELL's vehicle, CAMPBELL
28 attempted to leave the area by reversing at a high rate of speed. Patrol cars with active

1 red and blue lights pursued CAMPBELL. CAMPBELL damaged and disabled his
2 vehicle when he attempted to flee officers in his vehicle by driving through a fence. The
3 contacting officer noted that prior to CAMPBELL exiting the vehicle, CAMPBELL had
4 been reaching around the vehicle in the vicinity of the center console. CAMPBELL then
5 ran from his vehicle, pursued by officers on foot, and was apprehended after attempting
6 to climb over a fence with razor wire. Officers reported there was no use of force taking
7 CAMPBELL into custody. CAMPBELL was the only occupant of his vehicle at the time
8 officers pursued him.

9 12. CAMPBELL agreed to speak with officers post-*Miranda*, but after being
10 briefly questioned about his activity, CAMPBELL stated he was done answering
11 questions. Due to injuries CAMPBELL sustained from razor wire, he was taken to the
12 hospital for treatment and later released.

13 13. On October 4, 2023, TPD officers obtained a Pierce County Superior Court
14 search warrant for CAMPBELL's BMW 650Ci, bearing Washington license plate
15 #BUL6767. During the execution of the search warrant, a Smith & Wesson, Model
16 SD9VE, 9mm handgun, was located tucked between the driver seat and center console.
17 The firearm was reported stolen under TPD case #2121800955. Also recovered from the
18 car was 12.91 pounds of marijuana separated into numerous clear plastic bags and some
19 lumped together in large trash bags.

20 14. On or about October 27, 2023, I conducted research on the firearm for
21 purposes of determining interstate nexus. Through my training and experience, along
22 with resources available to the ATF including proprietary documentation, direct contact
23 with manufacturers, and consultation experts within ATF, I determined that the firearm is
24 a "firearm" as defined by federal law, and that the firearm was not manufactured in the
25 State of Washington. As a result, the firearm must have traveled in, and thereby affected,
26 interstate or foreign commerce, in order to be received or possessed in the State of
27 Washington.
28

1 15. I have reviewed CAMPBELL's criminal history and observed he has
2 multiple felony convictions punishable by imprisonment for a term exceeding one year,
3 each of which would federally prohibit him from possessing firearms. One of these
4 convictions is:

5 *Conspiracy to Distribute Cocaine*, in United States District Court for the
6 Western District of Washington, under case number 2:09-CR-353, on or
about June 25, 2010;

7 16. A review of the Judgment in the 2010 case indicates that CAMPBELL pled
8 guilty to the charge and was sentenced to a total term of 78 months' imprisonment. The
9 defendant and his lawyer were present at sentencing.

10 17. Based on the above facts, I respectfully submit that there is probable cause
11 to believe that CAMPBELL committed the aforementioned crime.

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14 

15 Kit K. Radosevich, Complainant
16 Special Agent
17 Bureau of Alcohol, Tobacco, Firearms
and Explosives

18
19 The above-named agent provided a sworn statement attesting to the truth of the
20 foregoing Complaint and Affidavit. Based on the Complaint and Affidavit, the Court
21 hereby finds there is probable cause to believe the Defendant committed the offense set
22 forth in the Complaint.

23 Dated this 7th day of November 2023.

24
25 

26 DAVID W. CHRISTEL
27 United States Magistrate Judge